

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND
(Northern Division)**

JEFFREY DOYLE

Plaintiff

v.

**FRONTLINE ASSET
STRATEGIES, LLC, *et al.***

Defendants.

MARIO DAZZA

Plaintiff

v.

**KIRSCHENBAUM, PHILLIPS &
LEVY, P.C., *et al.***

Defendants.

ROBERTO ARACENA

Plaintiff

v.

**ELTMAN LAW, P.C. D/B/A
ELTMAN, ELTMAN &
COOPER, P.C.**

Defendant.

PLAINTIFFS' MOTION TO CONSOLIDATE CASES

Plaintiffs Jeffrey Doyle, Mario Dazza, and Roberto Aracena in the above captioned actions, by and through the undersigned counsel, on their behalf and on behalf of the putative class members, request the consolidation of the pending matters of *Doyle v. Frontline Asset Strategies, LLC*, et al., Case No. 1:16-cv-03501-RDB (“Doyle”), *Dazza v. Kirschenbaum, Phillips & Levy, P.C.*, et al., Case No. 1:16-cv-03954-RDB (“Dazza”) and *Aracena v. Eltman Law, P.C.*, Case No. 1:16-cv-03851-CCB (“Aracena”)¹ (collectively “Cases”) and state:

1. Fed. R. Civ. P. 42(a) provides: “[i]f actions before the court involve a common question of law or fact, the court may: (1) join for hearing or trial any or all matters at issue in the actions; (2) consolidate the actions; or (3) issue any other orders to avoid unnecessary cost or delay.”

2. When there is substantial overlap between two cases, it is in the interest of judicial economy to consolidate the cases. *Coyne & Delaney Co. v. Selman*, 98 F.3d 1457, 1473 (4th Cir. 1996).

3. These Cases should be consolidated since: (i) all of the Cases are pending in this Court; (ii) all of the plaintiffs in the Cases are represented by the same legal counsel and all of the defendants in the Cases are represented by the same legal counsel; (iii) all of the Cases involve common issues of law as they essentially allege similar violations of the Fair Debt Collection Practices Act (“FDCPA”) and the Maryland Consumer Debt Collection Act (“MCDCA”) against the defendants; and (iv) all of the Cases involve common issues of fact in that they arise out of defendants’ attempts to collect on void judgments in Maryland state courts entered in favor of unlicensed collection agencies.

¹ An identical version of this motion is being filed concurrently in all cases identified on the caption.

4. Plaintiffs' counsel contacted defendants' counsel in each and defendants' counsel conveyed to plaintiffs' counsel that he was unable to obtain authority from any of the defendants to consent to this Motion to Consolidate.

5. Plaintiffs request that the Cases be consolidated for all purposes under 1:16-cv-03501-RDB, with Jeffrey Doyle as the lead plaintiff, individually and on behalf of all others similarly situated.

WHEREFORE, Plaintiffs Jeffrey Doyle, Mario Dazza, and Roberto Aracena request the Court consolidate the pending matters of *Doyle v. Frontline Asset Strategies, LLC*, et al., Case No. 1:16-cv-03501-RDB, *Dazza v. Kirschenbaum, Phillips & Levy, P.C.*, et al., Case No. 1:16-cv-03954-RDB, and *Aracena v. Eltman Law, P.C.*, Case No. 1:16-cv-03851-CCB.

Respectfully submitted,

//s// Matthew Thomas Vocci

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//s/ Scott C. Borison

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this document was served by the Court's ECF system when filed with the Court on this 20th day of April, 2017 to all counsel and parties of record in this matter.

//s/

Matthew Thomas Vocci